

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

Ningbo Mizhihe I&E Co., Ltd.,

Plaintiff,

v.

Does 1-200; Drewshow, et al.,

Defendants.

Civil Action No. 19-CV-06655 (AKH)

**MOTION TO VACATE ENTRY OF
DEFAULT**

Motion to Vacate Entry of Default

PLEASE TAKE NOTICE that upon the Memorandum in Support of their Motion to Vacate Entry of Default and all exhibits attached hereto and the Declaration of Adam Edward Urbanczyk, both filed herewith, defendants 4Memorys, Dreshow, and Deng Kai (the “Defendants”) will move this Court, before the Honorable Alvin K. Hellerstein in Room 14D Daniel Patrick Moynihan United States Courthouse 500 Pearl St. New York, NY 10007-1312 on a date and at a time to be designated by the Court, if any, for an Order pursuant to Federal Rule of Civil Procedure 55 vacating the default entered against Defendants [Dkt. 68] on grounds that: (i) Defendants’ default was not willful; (ii) setting aside the default will not prejudice Plaintiff; and (iii) Defendants have meritorious defenses which they should be permitted to raise.

PLEASE TAKE FURTHER NOTICE that pursuant to the Court’s Local Rule 6.1(b), Plaintiff’s opposition papers must be filed by November 26, 2019, and Defendants’ reply must be filed by December 3, 2019.

Dated November 12, 2019

Respectfully submitted,

/s/Adam E. Urbanczyk

Adam E. Urbanczyk

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